

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn*^o
David M. Estes
Adam M. Epstein^o

Karen G. Kelsen^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater^o
Trevor D. Dickson

^oMember of N.J. & N.Y. Bars

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

January 2, 2024

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of N.J.
Mitchell S. Cohen Building &
U.S. Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the January 4,
2024 case management conference.

1. Status of Losartan/Irbesartan TPP Fact Sheet.

Counsel for Third-Party Payor (“TPP”) Plaintiffs and Defendants in the
losartan and irbesartan cases have continued to meet and confer and negotiate the
content of the TPP Plaintiff Fact Sheet for the losartan and irbesartan cases. While

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the Parties have reached agreement with respect to a substantial portion of the content of that TPP Plaintiff Fact Sheet, the Parties anticipate that there will be some issues on which agreement is not reached. Therefore, the Parties request that at the status conference on January 4, 2024, the Court set a schedule for letter briefing and a hearing on any issues that the parties do not reach agreement on with respect to the TPP Plaintiff Fact Sheet for the losartan and irbesartan cases.

2. Pre-Trial Order for the Upcoming Trial.

The Parties have begun to discuss the Pre-Trial Order, and seek the Court's guidance regarding the contents and timing.

3. Time Limits for Supplemental Depositions of TPP Trial Damages Experts.

The Parties are conferring regarding potential limits on the supplemental depositions of damages experts, and may ask Judge Vanaskie to decide the matter if they are not able to come to an agreement.

4. PFS Deficiencies and Orders to Show Cause.

Plaintiffs will be prepared to address this issue during the conference.

Respectfully,



ADAM M. SLATER

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Cc: All counsel of record (via ECF)